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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA <u>ex rel.</u>)	CASE NO. C-11-0941 EMC
CAMPIE,)	
Plaintiff and Relator,)	DECLARATION OF LEONARD RUSSO
v.)	IN SUPPORT OF THE UNITED STATES'
)	MOTION TO DISMISS RELATOR'S
)	SECOND AMENDED COMPLAINT;
GILEAD SCIS., INC.,)	Date: June 20, 2019
Defendant.)	Time: 1:30 p.m.
)	The Honorable Edward M. Chen
)	Courtroom 5, 17th Floor

DECLARATION OF LEONARD RUSSO

I, Leonard Russo, declare:

1. I am a Special Agent at the United States Department of Health and Human Services, Office of Inspector General. After Relators filed this action in 2010, I participated in an investigation of Gilead Sciences, Inc. Based on my participation in the investigation and my review of documents relating to the investigation, I have personal knowledge of the matters set forth herein.

3. The government also selected multiple manufacturing lots for which Relators had alleged specific and potentially serious problems and obtained a complete review of the history of the lots from “cradle to grave,” which accounted for the disposition of each lot with supporting documentation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 27, 2019 in Seattle, Washington.

Leonard Russo
SPECIAL AGENT LEONARD RUSSO